



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-8960**

JAN 28 2009

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Kristin L. Spangler
Environmental Coordinator
Cessna Aircraft Company Midland Assembly Plant
6000 Technology Parkway
Midland, Georgia 30308-2209

SUBJ: Notice of Violation
EPA ID # - GAR 000 052 951

Dear Ms. Spangler:

On January 14, 2009, the U.S. Environmental Protection Agency (EPA) and the Georgia Environmental Protection Division (GA EPD) conducted a hazardous waste compliance evaluation inspection (CEI) at the Cessna Aircraft Company Midland Assembly Plant (Cessna) facility located in Midland, Georgia. Enclosed is an EPA Resource Conservation and Recovery Act (RCRA) CEI Report.

Based on information collected during EPA's inspection of this facility, EPA has determined that Cessna has violated certain requirements of the RCRA, 42 U.S.C. §§ 6901 to 6992, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616 and Chapter 391-3-11 of the Rules of the Georgia Department of Natural Resources Environmental Protection Division (GA DNR).

Specifically, these violations include noncompliance with the requirements of RCRA outlined in the RCRA CEI Report enclosed herein.

A copy of this report is also being forwarded to GA EPD. Please forward documentation of actions taken by your facility within thirty (30) days of receipt of this letter to show what actions have been taken by your facility to correct the violations documented in the enclosed RCRA CEI Report.

If you have any questions regarding the alleged violations, please contact Daryl Himes, of my staff, at (404) 562-8614.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Ney', with a stylized, cursive flourish at the end.

Frank Ney, Acting Chief
South Section
RCRA & OPA Enforcement & Compliance Branch

Enclosure

cc: Ms. Renee Hudson-Goodley GA EPD

RCRA Inspection Report

1) Inspector and Author of Report

Daryl Himes
Environmental Engineer

2) Facility Information

Cessna Aircraft Company Midland Assembly Plant (Cessna)
6000 Technology Parkway
Midland, Georgia 30308-2209

EPA ID # - GAR 000 052 951

3) Responsible Official

Ms. Kristin L. Spangler
Environmental Coordinator

4) Inspection Participants

Daryl Himes, US EPA
Paula Whiting, US EPA (Bridge Intern)
Kristin Spangler

5) Date and Time of Inspection

January 14, 2009
10:30A.M.

6) Applicable Regulations

Section 391-3-11 of the Georgia Hazardous Waste Management Rules (GHWMR) promulgated pursuant to the Georgia Hazardous Waste Management Act.

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 C.F.R. Parts 260 - 266, 268, 270, 273 & 279.

7) Purpose of Inspection

The purpose of the inspection is to conduct an unannounced compliance evaluation inspection (CEI) and determine the facility's compliance with all applicable regulations.

8) Facility Description

Cessna is an aircraft component assembly plant. Control surfaces, wings and the bodies of several types of aircraft produced by Cessna are assembled at this facility. Prior to this inspection, the facility notified as a large quantity generator of hazardous waste according to an EPA notification form filed on June 18, 2008.

9) Findings

Prior to performing a walk through inspection of the facility, a brief discussion of the intent of the inspection was held with the primary facility representative. During this discussion, the representative was told that the facility's manufacturing areas would be inspected.

Facility personnel indicated at the beginning of the walk-through inspection that this facility does not perform welding, painting (other than minor touch up) or electroplating operations at this facility. The building housing the operations was one open building. As discussed prior to the walkthrough, all of the operations being performed in the warehouse were assemble operations.

Hazardous wastes observed during the walk-through inspection included the following:

Four hazardous waste 55-gallon satellite accumulation containers in one area (See Photo #1); and three hazardous waste 55-gallon satellite accumulation containers in another. Each of the containers were closed and labeled with the words "Hazardous Waste" at the time of the inspection.

Each of the two areas included containers for bits and pieces of chrome waste generated from drilling, cutting and grinding operations that are performed during the manufacturing and assembly process. Each of the two areas included a container for waste rags from the incidental use of anodyne solutions. Each area also contained a container for the collection of rags used for cleanup following minor paint touch up operations. The area which had four containers had one for paint wastes.

The facility's container accumulation area consisted of ten 55-gallon containers (See Photo #2). The makeup of the containers was of the same types of wastes discussed above. Each of the containers were closed and labeled with the words "Hazardous Waste" at the time of the inspection. Three of the containers were not dated with accumulation start dates at the time of the inspection (See Photo #3). While the facility had previously notified as a large quantity generator of hazardous waste, the amount of waste accumulated, at the time of the inspection, put the facility into the small (greater than 100 and less than 1000 kilograms) quantity generator category. **Cessna appeared**


to be in violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act (40 C.F.R. § 262.34(a)(2) by failing to keep containers of hazardous waste labeled with accumulation start dates.

The facility did not have spill control equipment at the facility at the time of the inspection. Cessna appeared to be in violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act (40 C.F.R. § 265.32(c) by failing to maintain spill control equipment at the facility.

Record Review

As this facility was considered a small quantity generator of hazardous waste at the time of the inspection and had not manifested any hazardous waste off-site, there were not any records to review.

10) Signed

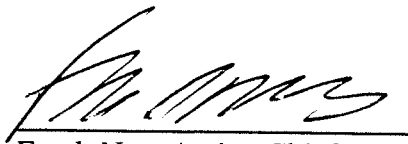


Daryl R. Himes
Environmental Engineer

1/21/09

Date

11) Concurrence



Frank Ney, Acting Chief
South Section
RCRA & OPA Enforcement and Compliance Branch

1/23/09

Date

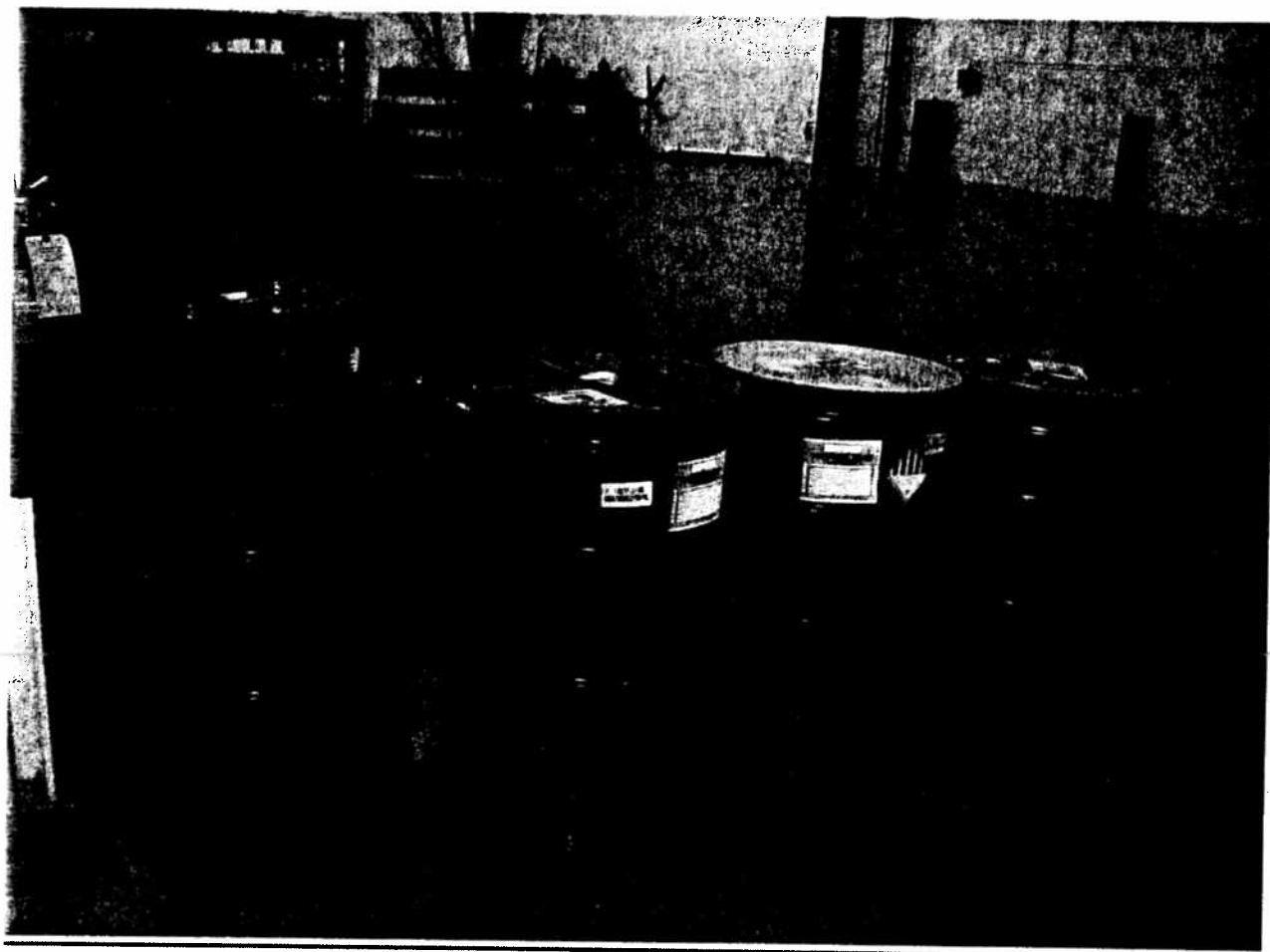


Photo # 1 – Satellite accumulation area which includes four different types of hazardous wastes.

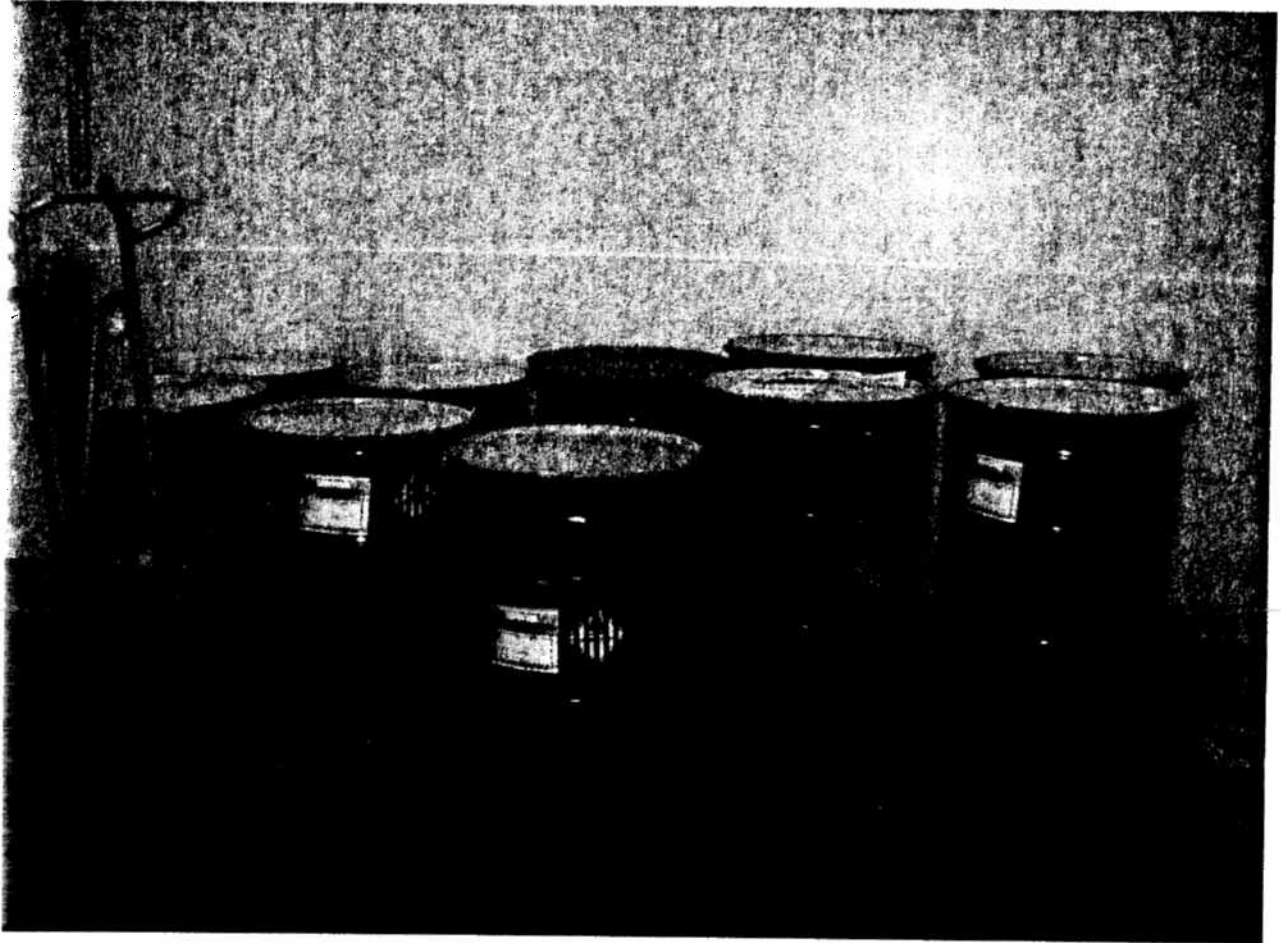


Photo # 2 – 180-day accumulation area

Cessna Aircraft-Midland Facility
RCRA Inspection Report
January 14, 2009

If you have any questions regarding the alleged violations, please contact Daryl Himes, of my staff, at (404) 562-8614.

Sincerely,

Frank Ney, Acting Chief
South Section
RCRA & OPA Enforcement & Compliance Branch

Enclosure

cc: Ms. Renee Hudson-Goodley GA EPD

Himes NEY
DRH
1/20/09
FSW
1/23/09

MAILED
1/23/2009



March 6, 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank Ney
Acting Chief, South Section
RCRA & OPA Enforcement & Compliance Branch
United States Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

SUBJECT: Notice of Violation
EPA ID # GAR 000 052 951

Dear Mr. Ney:

Please find enclosed documentation of the actions taken by Cessna Aircraft in response to the violations found during the audit conducted by Daryl Himes on January 14, 2009. That audit was conducted at the Midland Assembly Plant on 6000 Technology Parkway, Midland, GA, 31820.

If you have questions or need additional information, please do not hesitate to contact me at (706) 569-2124.

Sincerely,

Kimberly Davidson
Environmental Coordinator

Cc: Ms. Renee Hudson-Goodley, GA EPD
Dan Rogers, Cessna Aircraft

MEMORANDUM

FROM: Kimberly Davidson
Environmental Coordinator

DATE: March 6, 2009

SUBJECT: Notice of Violation
EPA ID# - GAR 000 052 951

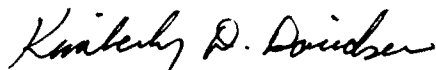
An unannounced compliance evaluation inspection (CEI) was conducted of the Midland Assembly Facility on January 14, 2009. Mr. Daryl Himes and Ms. Paula Whiting were accompanied by Kristen Spangler, Cessna Aircraft's Environmental Coordinator, at the time. During that inspection, the auditors found two violations. The first violation was for failing to keep containers of hazardous waste labeled with accumulation start dates. The second violation was for failing to maintain spill control equipment at the facility.

To address the first violation, the drums that did not have the accumulation start date on the label, were corrected immediately (see picture 1). In addition, the operators that handle the drums were reminded of the requirements.

To address the second violation, two spill kits were relocated to that facility. The first is located in the 90-day storage area while the second is located outside near the air compressors and the shipping docks (see pictures 2 and 3).

If you have questions or need additional information, please do not hesitate to contact me at (706) 569-2124.

Sincerely,



Kimberly Davidson
Environmental Coordinator

U.S. EPCRA 112, WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S., (ISOPROPYL ALCOHOL, METHYL PROPYL KETONE)
4.1, PG III

Line #1

4.1
HAZARD CLASS

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

CAUTION

MANIFEST TRACKING #		ACCUMULATION START DATE 2-19-09	
GENERATOR Cessna Aircraft Company Midland Assembly Plant			
ADDRESS 6000 Technology Parkway			
CITY Midland		ST GA	ZIP 31820
GENERATOR'S EPA IDENTIFICATION NUMBER GAR0000052951		EPA HAZARD NAME Toxic/Ignitable	
WASTE CODES D001 D006 D007 D008 F003 F005			
PROFILE CH324261	DESCRIPTION FLAMMABLE SOLID WASTE, TRASH AND DEBRIS		CUST. CONTROL# C000000103

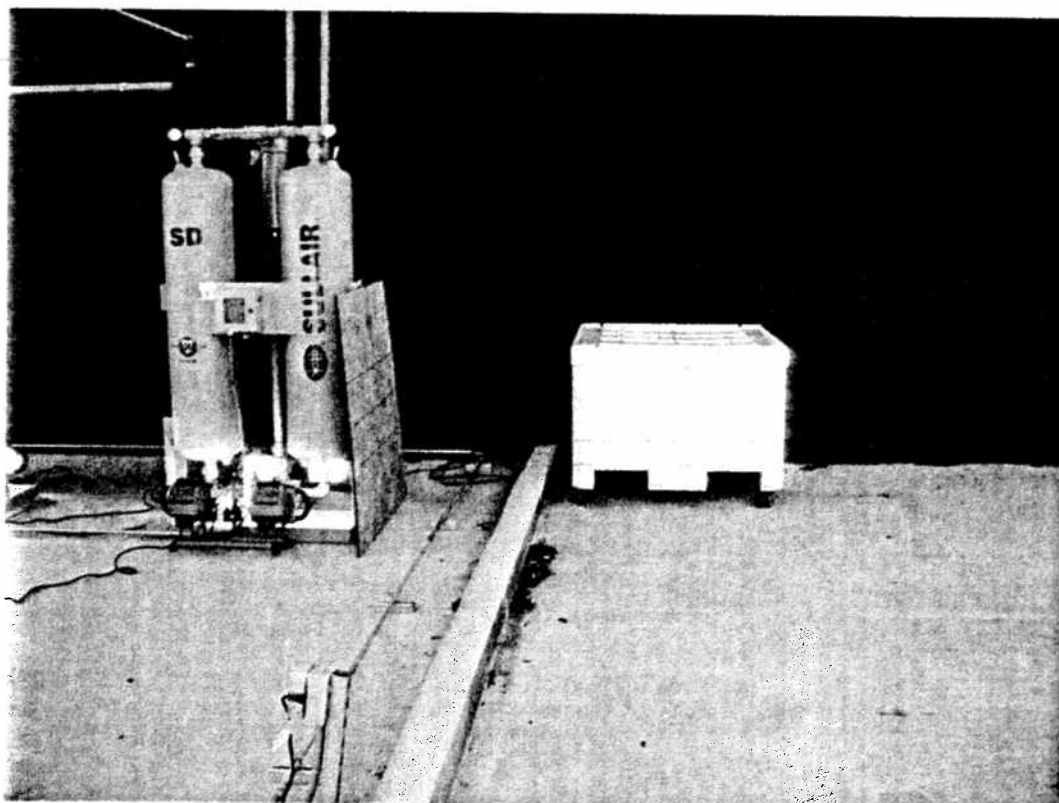
CONTAINS HAZARDOUS OR TOXIC WASTE

HAZARDOUS CONSTITUENTS

PART # HW300W REV 01 08/06

2/2

Picture 1 – Label on a drum in the accumulation area. Accumulation start date is correctly identified



Picture 2 – Spill kit located outside next to the air compressors



Picture 3 – Spill kit located in the hazardous waste storage area



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

**ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303-8960**

FEB 17 2009

2009

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Ms. Kristin L. Spangler
Environmental Coordinator
Cessna Aircraft Company
4800 Cargo Drive
Columbus, Georgia 30308-2209

SUBJ: Notice of Violation
EPA ID # - GAD980803621

Dear Ms. Spangler:

On January 14, 2009, the U.S. Environmental Protection Agency (EPA) and the Georgia Environmental Protection Division (GA EPD) conducted a hazardous waste compliance evaluation inspection (CEI) at the Cessna Aircraft Company (Cessna) facility located in Columbus, Georgia. Enclosed is an EPA Resource Conservation and Recovery Act (RCRA) CEI Report.

Based on information collected during EPA's inspection of this facility, EPA has determined that Cessna has violated certain requirements of the RCRA, 42 U.S.C. §§ 6901 to 6992, as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), Pub. L. 98-616 and Chapter 391-3-11 of the Rules of the Georgia Department of Natural Resources Environmental Protection Division (GA DNR).

Specifically, these violations include noncompliance with the requirements of RCRA outlined in the RCRA CEI Report enclosed herein.

A copy of this report is also being forwarded to GA EPD. Please forward documentation of actions taken by your facility within thirty (30) days of receipt of this letter to show what actions have been taken by your facility to correct the violations documented in the enclosed RCRA CEI Report.

If you have any questions regarding the alleged violations, please contact Daryl Himes, of my staff, at (404) 562-8614.

Sincerely,

A handwritten signature in black ink, appearing to read 'Frank Ney', with a long horizontal flourish extending to the right.

Frank Ney, Acting Chief
South Section
RCRA & OPA Enforcement & Compliance Branch

Enclosure

cc: Ms. Renee Hudson-Goodley GA EPD

RCRA Inspection Report

1) Inspector and Author of Report

Daryl Himes
Environmental Engineer

2) Facility Information

Cessna Aircraft Company
4800 Cargo Drive
Columbus, Georgia 31907

EPA ID # - GAD 980 803 621

3) Responsible Official

Ms. Kristin L. Spangler
Environmental Coordinator

4) Inspection Participants

Daryl Himes, US EPA
Paula Whiting, US EPA (Bridge Intern)
Kristin Spangler

5) Date and Time of Inspection

January 14, 2009
10:30A.M.

6) Applicable Regulations

Section 391-3-11 of the Georgia Hazardous Waste Management Rules (GHWMR) promulgated pursuant to the Georgia Hazardous Waste Management Act.

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopts and incorporates by reference 40 C.F.R. Parts 260 - 266, 268, 270, 273 & 279.

7) Purpose of Inspection

The purpose of the inspection is to conduct an unannounced compliance evaluation inspection (CEI) and determine the facility's compliance with all applicable regulations.

Three hazardous waste 55-gallon satellite accumulation containers were observed in the area of Paint Booth #2. The three containers consisted of floor sweepings, paint waste, and paint gun cleaning solvent. At the time of the inspection, the floor sweep and paint waste container lids were not fastened securely to the tops of the containers to properly close the containers. **Cessna appeared to be in violation of Chapter 391-3-11-.08 of the Georgia Hazardous Waste Management Act (40 C.F.R. § 262.34(c)(1)(i) by failing to keep containers of hazardous waste closed in accordance 40 C.F.R. § 265.173(a).**

Single Engine Area

Three hazardous waste 55-gallon satellite accumulation containers were observed in this area. The three containers consisted of an anodyne waste, chrome contaminated materials waste and a chrome solids waste. Each of the containers was labeled properly and closed.

Roll-Off Area

Two hazardous waste roll-off containers were located outside of the main building at the time of the inspection. The roll-off containers were used to manage wastewater treatment plant sludge and paint filter materials (D006/D007/D008). Each of the containers was properly labeled and closed at the time of the inspection.


90-Day Hazardous Waste Accumulation Area

There was no hazardous waste observed in this area at the time of the inspection.

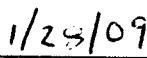
Record Review

No violations were observed during a review of the facility's inspection records, contingency plan, personnel training and manifests.

10) Signed



Daryl R. Himes
Environmental Engineer



Date

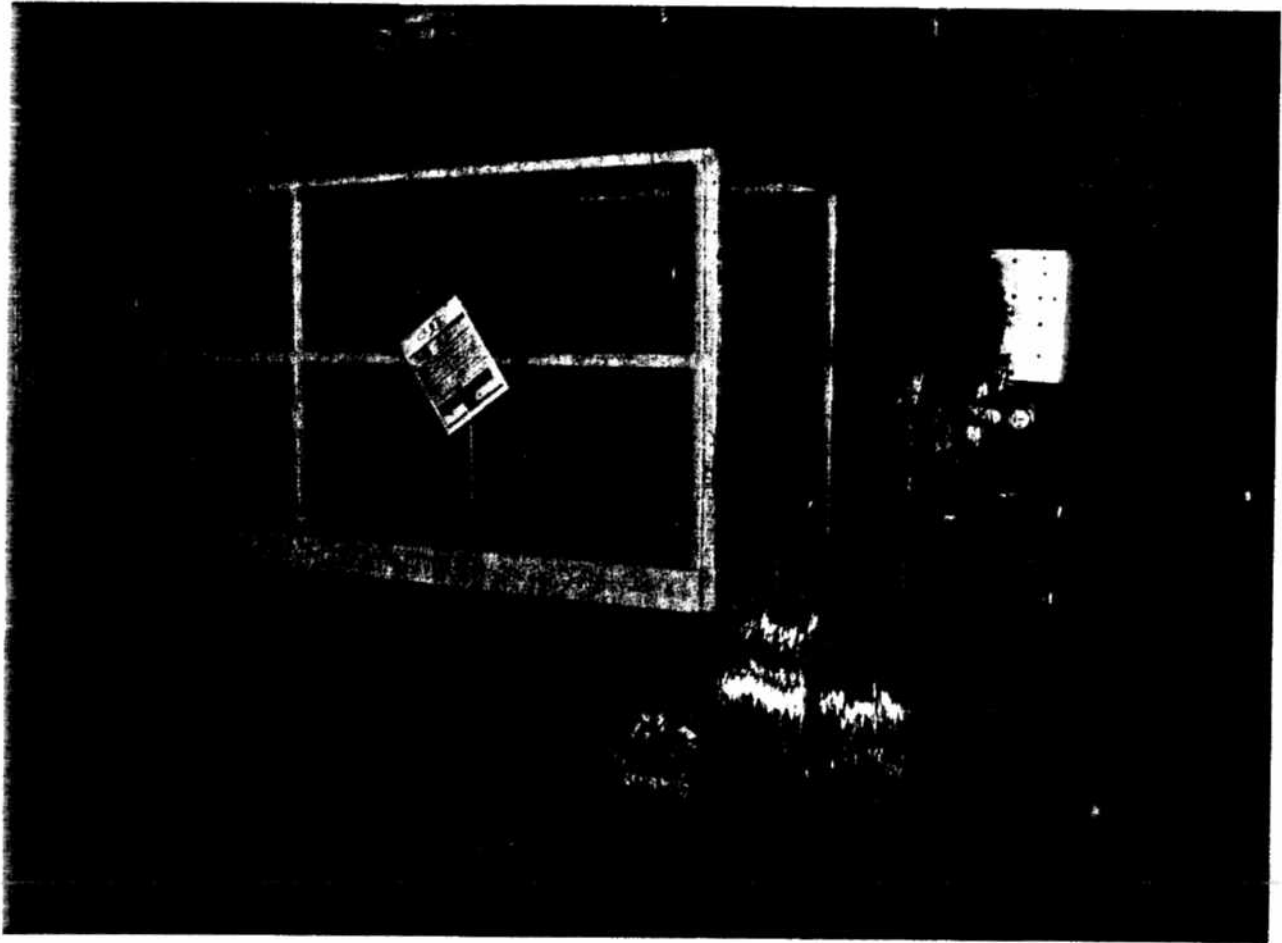


Photo # 1 – Vapor Degreaser

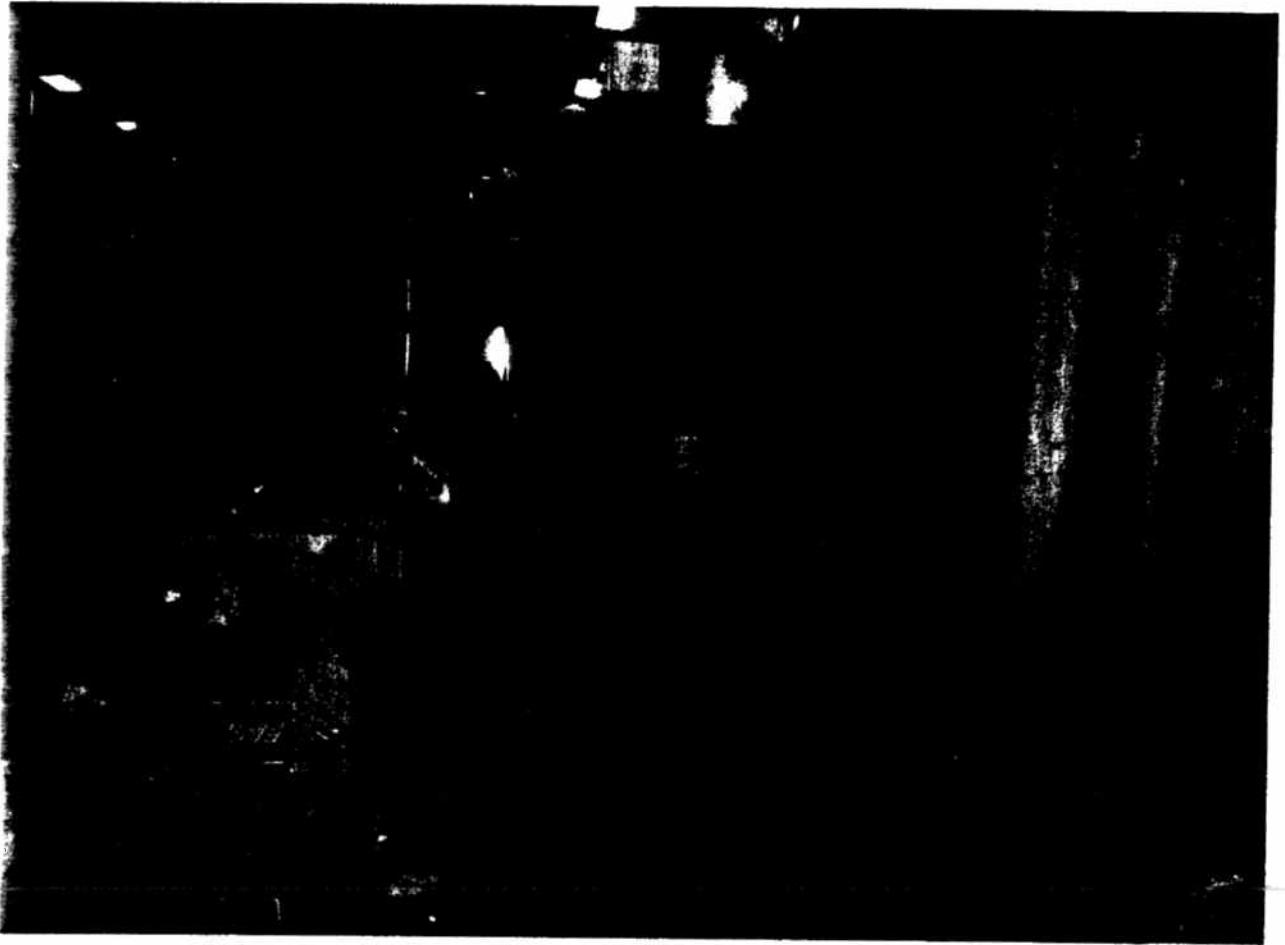


Photo # 2 – Waste Water Treatment Equipment